



CITY OF SAINT PAUL
Christopher B. Coleman, Mayor

*25 West Fourth Street
Saint Paul, MN 55102*

*Telephone: 651-266-6700
Facsimile: 651-228-3220*

May 14, 2009

Michele K. Smith
Office of Community Planning and Development
U.S. Department of Housing and Urban Development
Minnesota State Office
920 Second Avenue South, Suite 1300
Minneapolis, MN 55402

Dear Ms. Smith:

SUBJECT: 2008 Saint Paul Consolidated Plan Substantial Amendment

Enclosed for your review, please find two copies of Saint Paul's Substantial Amendment to the 2008 Consolidated Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP). The City of Saint Paul is pleased to participate in this program, and appreciates the assistance provided by HUD staff during the preparation of this amendment.

If you or your staff have any questions concerning the Substantial Amendment, or require any additional information, please feel free to contact Joe Collins at 651-266-6020 or Ron Ross at 651-266-6692.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Coleman".

for Christopher Coleman
Mayor

Enclosure

Application for Federal Assistance SF-424

Version 02

***1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

***2. Type of Application**

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s)

*Other (Specify) _____

3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

*5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*a. Legal Name: City of Saint Paul, MN

*b. Employer/Taxpayer Identification Number (EIN/TIN):
41-6005521

*c. Organizational DUNS:
96-166-3390

d. Address:

*Street 1: 25 W. Fourth St.
Street 2: _____
*City: Saint Paul
County: Ramsey
*State: MN
Province: _____
*Country: USA
*Zip / Postal Code 55102

e. Organizational Unit:

Department Name:
Planning & Economic Development (PED)

Division Name:
Administrative Services

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr. *First Name: Joe
Middle Name: _____
*Last Name: Collins
Suffix: _____

Title: Project Manager

Organizational Affiliation:

*Telephone Number: 651-266-6020

Fax Number: 651-228-3261

*Email: Joe.Collins@ci.stpaul.mn.us

Application for Federal Assistance SF-424

Version 02

***9. Type of Applicant 1: Select Applicant Type:**

C. City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

U.S. Department of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-257

CFDA Title:

***12 Funding Opportunity Number:**

CFDA #14-257

*Title:

HPRP

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

City of Saint Paul, MN

***15. Descriptive Title of Applicant's Project:**

Homelessness Prevention & Rapid Re-Housing Program (HPRP)

Application for Federal Assistance SF-424

Version 02

16. Congressional Districts Of:

*a. Applicant: Fourth

*b. Program/Project: Fourth

17. Proposed Project:

*a. Start Date: 9/30/09

*b. End Date: 9/30/12

18. Estimated Funding (\$):

*a. Federal	\$3,298,163
*b. Applicant	
*c. State	
*d. Local	
*e. Other	
*f. Program Income	
*g. TOTAL	\$3,298,163

*19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on _____
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E. O. 12372

*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)

☐ Yes ☒ No

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

Authorized Representative:

Prefix: _____ *First Name: Christopher

Middle Name: B.

*Last Name: Coleman

Suffix: _____

*Title: Mayor

*Telephone Number: 651-266-8510

Fax Number: _____

* Email: Chris.Coleman.ci.stpaul.mn.us

*Signature of Authorized Representative: 

*Date Signed: 5/12/09

Authorized for Local Reproduction

on behalf of Mayor

Standard Form 424 (Revised 10/2005)
Prescribed by OMB Circular A-102

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Grantees eligible to receive funds under the Homelessness Prevention and Rapid Re-Housing Program (HPRP) are required to complete a substantial amendment to their Consolidated Plan 2008 Action Plan. This form sets forth the required format for this substantial amendment. A completed form is due to HUD within 60 days of the publication of the HUD HPRP notice.

To aid grantees in meeting this submission deadline, the HPRP Notice reduces the requirement for a 30-day public comment period to no less than 12 calendar days for this substantial amendment. With this exception, HPRP grantees are required to follow their Consolidated Plan's citizen participation process, including consultation with the Continuum of Care (CoC) in the appropriate jurisdiction(s). Grantees are also required to coordinate HPRP activities with the CoC's strategies for homeless prevention and ending homelessness. To maximize transparency, HUD strongly recommends that each grantee post its substantial amendment materials on the grantee's official website as the materials are developed.

A complete submission contains the following three documents:

- 1) A signed and dated SF-424,
- 2) A completed form HUD-40119 (this form), and
- 3) Signed and dated General Consolidated Plan and HPRP certifications.

For additional information regarding the HPRP program, visit the HUD Homelessness Resource Exchange (www.hudhre.info). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

The information collection requirements contained in this application have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

Information is submitted in accordance with the regulatory authority contained in each program rule. The information will be used to rate applications, determine eligibility, and establish grant amounts.

Public reporting burden for this collection of information is estimated to be 16 hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This information is required to obtain benefits. To the extent that any information collected is of a confidential nature, there will be compliance with Privacy Act requirements. However, the substantial amendment to the Consolidated Plan 2008 Action Plan does not request the submission of such information.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

A. General Information

Grantee Name	City of Saint Paul
Name of Entity or Department Administering Funds	Saint Paul Planning and Economic Development Department
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Joe Collins
Title	Program Coordinator
Address Line 1	1300 City Hall Annex
Address Line 2	25 West Fourth Street
City, State, Zip Code	Saint Paul, MN 55102
Telephone	651-266-6020
Fax	651-228-3261
Email Address	joe.collins@ci.stpaul.mn.us
Authorized Official (if different from Contact Person)	Chris Coleman
Title	Mayor, City of Saint Paul
Address Line 1	390 City Hall
Address Line 2	15 West Kellogg Boulevard
City, State, Zip Code	Saint Paul, MN 55102
Telephone	651-266-8510
Fax	651-266-8521
Email Address	chris.coleman@ci.stpaul.mn.us
Web Address where this Form is Posted	www.stpaul.gov/recovery

Amount Grantee is Eligible to Receive*	\$3,298,163
Amount Grantee is Requesting	\$3,298,163

*Amounts are available at <http://www.hud.gov/recovery/homelesspreventrecov.xls>

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

B. Citizen Participation and Public Comment

1. Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment (limit 250 words).

Response: In accordance with HUD's Consolidated Plan regulations, Section 91.105 (c)(1) – Section 91.105(c)(3), the City of Saint Paul's Citizen Participation Plan addresses the requirements for "Substantial Amendments" to its Consolidated Plan and its public participation process.

Before drafting the Substantial Amendment, the City consulted with numerous interested parties, including homeless service providers, Ramsey County Continuum of Care Coordinator, Ramsey County Homeless Prevention Coordinator, the Family Homeless Prevention and Assistance Program Advisory Committee, local foundation, and government staff.

In compliance with the City's Citizen Participation Plan, the City published a notice in the *Saint Paul Pioneer Press*, and the City contacted the City's multicultural media.

The Homelessness Prevention and Rapid Rehousing Program required a 12-day public comment period. Correspondingly, the notice identified available locations to obtain the Substantial Amendment, the public comment period, and time and location of the public hearing.

The Substantial Amendment is available for review at Saint Paul Public Libraries, District Council Offices, Community Development Corporation offices, and City offices. A copy was posted on the City's website.

A public hearing was held in a location accessible to physically disabled citizens. Comments were also accepted during the Saint Paul Area Coalition for the Homeless meeting.

The City accepted written comments, including emails. (See attachment.) Comments were summarized and published along with reasons why comments were or were not incorporated in the amendment.

The City will respond to all written complaints related to Substantial Amendment within 15 working days of receiving the complaint.

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

2. Provide the appropriate response regarding this substantial amendment by checking one of the following options:

- ☐ Grantee did not receive public comments.
☒ Grantee received and accepted all public comments.
☐ Grantee received public comments and did not accept one or more of the comments.

3. Provide a summary of the public comments regarding this substantial amendment. Include a summary of any comments or views not accepted and the reasons for non-acceptance.

Response: The City of Saint Paul appreciated comments for the City's Substantial Amendment to the Consolidated Plan for the Homelessness Prevention and Rapid Rehousing Program. The City's response to comments area as follows:

1. *Accept HPRP Funds – The HPRP Notice establishes allows for grantees to decline their share of HPRP resources. We are urging all jurisdictions to apply for HPRP funds if eligible.*

Response: The City of Saint Paul will apply for all HPRP funds as eligible.

2. *Ensure public and provider participation in substantial amendment development. The Notice grants jurisdiction the option to shorten the citizen participation comment period on the "substantial amendment" to the Consolidated Housing Plan they will be preparing as a condition for receiving HPRP funds. We encourage you to utilize more generous comment periods as well as information gathering methods outside of formal citizen participation to assure the substantial amendment has community members and people at risk or experiencing homelessness's buy-in and support.*

Response: The City believes in citizen participation. Recognizing the short timeline for the HPRP, the City of Saint Paul and Ramsey County held numerous meetings with service providers, FHPAP Advisory Committee, foundation representatives, government representatives, and the Coordinator for *Heading Home Ramsey* in order to seek public comment – prior to drafting the Substantial Amendment. Furthermore, the City scheduled a presentation of the Substantial Amendment to the Saint Paul Coalition for the Homeless in recognition that some homeless residents attend this meeting. Nonetheless, the City incorporated the Coalition's recommendations. Moreover, to seek community wide comment, the City

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

contacted the City's multi-cultural media to announce its public hearing in addition to a public hearing notice in the Saint Paul *Pioneer Press*.

3. *Target HPRP resources to poorest Americans — The Notice permits grantees to extend HPRP to individuals and families with incomes at or below 50 percent of AMI. We are urging you to target HPRP services to individuals and families with the greatest need for prevention or rapid re-housing. We encourage St. Paul to prioritize funding at 30% and below metropolitan median income.*

Response: To meet the HPRP national objectives, the City is targeting households at 30% AMI for the Rapid Rehousing Program, and the City is targeting households at 50% AMI for the Homelessness Prevention Program.

4. *Include persons in shared housing as eligible recipients — The Notice describes various risk factors for homelessness that jurisdictions ought to consider when determining an individual's eligibility for homelessness prevention assistance. We recommend that you include individuals and families sharing the housing of others due to loss of housing, shared housing, or similar circumstance to be eligible recipients for HPRP prevention assistance.*

Response: When the City issues the RFP, the City will recognize the various risk factors for homelessness that the HPRP recognizes. Furthermore, the City understands that at-risk of being homeless households are often at imminent risk of being homeless even when sharing housing. In fact, City recognizes that the emergency shelters are often so full that homeless families must seek other housing alternatives or stay inhospitable environments. Additionally, the City knows that homeless youth will "couch-hop" with friends rather than stay at an emergency shelter. Therefore, as part of the RFP, the City will recognize that precariously housed individual may meet the definition of being "imminently" at risk of being homeless.

5. *Assure Permanency Planning — The Notice places a time limit of 18 months on rental assistance provided to HPRP participants. We urge you to classify rental subsidies as transitional housing subsidies so participants may maintain eligibility for other programs. We urge that you articulate a clear processes and commitments of resources to assure transition of HPRP participants receiving rental assistance into permanent housing following the conclusion of the term of their HPRP rental assistance.*

Response: With the City's RFP, the City will encourage service providers to provide a service model that empowers homeless citizens to achieve

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

stable housing. The City will consider classifying rental subsidies as transitional housing subsidies if participants can maintain eligibility for other programs. Nonetheless, the City has clearly stated that HPRP is temporary funding. Consequently, service providers must assist homeless citizens in a manner that empowers homeless citizens to secure stable housing while using temporary funding. For Rapid Rehousing, the City recommends shallow subsidy amounts as offered in Hennepin County. The City is also encouraging service providers to collaborate with employment service providers because homeless citizens need employment as well as housing. Finally, the City provides financing for affordable housing including some low-income housing tax credit buildings. At this time, the City is working with Minnesota Housing to increase the supply of affordable housing through the application of other ARRA programs.

7. *Assure Availability of Supportive Services — The Notice disqualifies most supportive services from eligibility for HPRP funding. Since supportive services are necessary complements to rental assistance and housing relocation or stabilization services, we request that you identify and increase other sources of funding for supportive services targeted to HPRP recipients. For example, the Recovery Act infuses state and local workforce agencies with significant resources for employment and training services. ESG jurisdictions should describe in their HPRP substantial amendment how they plan to connect HPRP recipients to supportive services offered by workforce and other supportive services providers. We encourage St. Paul to target specific resources to provide legal assistance to Tenants living in units in foreclosure.*

Response: The City agrees that supportive services are necessary complements to rental assistance, housing relocation, and stabilization services. Consequently, within the RFP process, the City will give higher priorities to service models that connect HRRP citizens to supportive services, such as Workforce Development. Additionally, a stated City priority is assisting tenants living in foreclosed rental buildings.

8. *Service provider considerations — We request equitable geographic distribution of HPRP providers and comparability in HPRP services offered by such providers so that potential participants need not “shop” for the provider with the best benefit package. It is imperative that the entitlement communities in the Twin Cities metropolitan region receiving HPRP funds and programs/communities funded through the State allocation of HPRP funds coordinate how you will utilize HPRP funds, so that you have similar levels of prevention and rent subsidy assistance to discourage potential participants from “shopping around”.*

Response: The City supports coordination of similar benefits provided by HPRP funds. It is the City's goal that Saint Paul homeless citizens secure

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

stable housing in Saint Paul. Moreover, it is especially important to the City that Saint Paul school-age children remain in their school of origin. Consequently, the City proposes similar rental assistance amounts as proposed for City of Minneapolis/Hennepin County.

9. *Supplement, rather than supplant, prevention funds — The Notice does not direct grantees to assure that they shall use HPRP resources to supplement, rather than supplant, state and local resources currently expended on homelessness prevention. We encourage you to expand not supplant commitments to people experiencing or at risk of homelessness, regardless of the absence of federal direction.*

Response: The City has publicly stated to service providers that the HPRP funds are one-time funds for a two-year period. Therefore, it is not the City position to supplant ongoing funds. However, as a jurisdiction, it should be noted that the City has very limited service funding (i.e. Emergency Shelter Grant and 5% of CDBG funding for program services). Most homelessness prevention programs are funded with state or federal dollars. On the other hand, the City of Saint Paul takes an active role in providing financing for affordable housing developments, including supportive housing and supportive housing for long-term homeless residents. Therefore, the City encourages service providers to address their concerns about ongoing service and homeless prevention funding to state or county agencies.

10. *Assure Effective Project Monitoring – The Notice requires grantees to monitor HPRP activities. We encourage you to include in your substantial amendment a robust monitoring plan sufficient for providing evidence of the effectiveness of the HPRP.*

Response: The City will have a robust monitoring plan as evidence in the Substantial Amendment as well as collecting HUD reporting data. Additionally, to create ongoing systemic change, the City will request that sub grantees provide a narrative of the key challenges facing the program participants and whether the HPRP funded activities prevent people from becoming homeless or assist homeless residents to secure permanent housing. The City will request that sub grantees use HMIS data, quarterly reports, and the program narratives to develop a non-judgmental, result-based, real time evaluation that describes the desired results in measurable terms and potential actions plans for continuous improvement of homelessness prevention efforts. These sub grantee internal reviews become outcome-based evaluation tools that capture HMIS data and other nonquantifiable anecdotal causation to demonstrate what service delivery works best to empower homeless citizens towards self-sufficiency.

11. *Limit HMIS data collection to only what is required by HUD to receive the*

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

HPRP funds. St. Paul HPRP funds should pay for all the providers' costs to collect and input HMIS data.

Response: The City allocated funds to pay for providers' HMIS costs based upon funding recommendation from the Saint Paul HMIS service provider.

12. *We request that St. Paul supports an expansion of technical assistance providers approved by HUD, to include current providers who have years of proven experience operating Prevention and Rapid Exit/Re Housing Programs. This would allow communities to access and utilize the expertise of our Prevention and Rapid Exit providers and Hennepin County staff to provide assistance in designing their program for their community. Hennepin County Staff and Providers have already provided extensive technical assistance to Ramsey County providers and staff.*

Response: The City supports the expansion of technical assistance providers approved by HUD to include current providers with proven experience operating Homelessness Prevention and Rapid Rehousing Programs.

13. Verbal Comments - Saint Paul Coalition for the Homeless Meeting
Initially, the City proposed the following:

Question 3: Rapid Rehousing

- Target households at 30% AMI
- Maximum assistance - \$4000/(1-2 bedroom need)
- Maximum assistance - \$8,000/(3+ bedroom need)

In response for program flexibility, the City now proposes:

Question 3: Rapid Rehousing

- Target households at 30% AMI
- General Parameters - \$4000/(1-2 bedroom need)
- General Parameters - \$8,000/(3+ bedroom need)

Initially, the City proposed the following:

Question 3: Homeless Prevention Program

- Maximum assistance - \$2500/household.
- All participants will be screened:
 - Homelessness is imminent without assistance
 - Limited assistance will prevent homelessness
 - Households meet 50% AMI.

Participating households *must* accept case management for a three-month period. Financial assistance will be for housing costs to the extent that participant can secure or retain housing.

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

In response to verbal comments, the City now proposes:

Question 3: Homeless Prevention Program

- Maximum assistance - \$2500/household.
- All participants will be screened:
 - Homelessness is imminent without assistance
 - Limited assistance will prevent homelessness
 - Households meet 50% AMI.

Participating households *may* accept case management for a three-month period. Financial assistance will be for housing costs to the extent that participant can secure or retain housing.

The City accepted written comments, including emails. Comments will be summarized and published along with reasons why comments were or were not incorporated in the amendment.

The City will respond to all written complaints related to Substantial Amendment within 15 working days of receiving the complaint.

C. Distribution and Administration of Funds

Reminder: The HPRP grant will be made by means of a grant agreement executed by HUD and the grantee. The three-year deadline to expend funds begins when HUD signs the grant agreement. Grantees should ensure that sufficient planning is in place to begin to expend funds shortly after grant agreement.

1. Check the process(es) that the grantee plans to use to select subgrantees. Note that a subgrantee is defined as the organization to which the grantee provides HPRP funds.

☒ Competitive Process

☐ Formula Allocation

☐ Other (Specify: _____)

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

2. Briefly describe the process(es) indicated in question 1 above (limit 250 words).

Response: The City will advertise and issue a Request for Proposals (RRP) in accordance with the City's procurement standards and procedures. The copies of RFP materials will be sent to current grantees and other interested organizations.

The City's notification for Request for Proposals includes, but not limited to:

- Purpose of the HPRP Grant
- Application Deadline
- Funds available
- Application Review process
- Performance Timelines for Grant
- Application procedures (Definitions, Certifications, such as copies of 501 C-3, Insurance Requirements)
- Vendor Fact Sheet
- Organizational Data (including HMIS experience)
- Documentation of Need and Service Proposal.(Program Activity, Targeted Population, Program Design, Service Model, Client Outcomes, Collaborations)
- Budgetary Information
- Reporting Requirements
- Audit and Monitoring
- Non-Discrimination Policies and Procedures

The City will issue its own RFP. Applications will be reviewed by a committee approved by the City. Proposals will be scored according to the RFP criteria. The review committee will be asked for substantive comments for each proposal. After all applications are scored, funding recommendations will be made to the Mayor and the Saint Paul City Council.

The City is collaborating with Ramsey Community Human Services Department in requesting proposals that create a comprehensive Homeless Prevention and Rapid Rehousing Program. Procedurally, interested parties may propose comprehensive homeless preventions solutions in recognition of possible funding from the federally-funded Homeless Prevention and Rapid Rehousing Program and the state-funded Family Homeless Prevention and Assistance Program.

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

3. Briefly describe the process the grantee plans to use, once HUD signs the grant agreement, to allocate funds available to subgrantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

Response: The City of Saint Paul will take all appropriate action to implement a plan with a corresponding timeline to ensure that the Homeless Prevention and Rapid Rehousing funds are allocated to subgrantees no later than September 30, 2009, as required by the HRRP notice.

The action timeline is as follows:

6/12/09:	Issue HPRP Requests for Proposals
7/15/09:	HPRP applications due.
7/16/09 – 7/31/09	HPRP application review process
8/12/09	City Council approval of grant awards
8/13/09	HPRP subgrantee announced and contracts delivered.
8/31/09	HPRP contracts will be due to City of Saint Paul. Subgrantee must submit contracts with authorizing signatures, work performance plan and program budgets. City of Saint Paul will execute contracts and begin to encumber funds.
9/1/09 – 9/20/09	City of Saint Paul will encumber all HPRP subgrantee contracts
9/21-9/25/09	City will submit required documents to HUD, as required

Please note: All of these dates are tentative. The City may expedite HPRP contracts sooner pending receipt of the HPRP Grant Agreement from HUD

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

4. Describe the grantee's plan for ensuring the effective and timely use of HPRP grant funds on eligible activities, as outlined in the HPRP Notice. Include a description of how the grantee plans to oversee and monitor the administration and use of its own HPRP funds, as well as those used by its subgrantees (limit 500 words).

Response: The City will administer all HPRP activities, including City and subgrantee activities, to ensure compliance of program requirements established by the HUD Notice and any subsequent HUD guidance.

First, the City will provide sound administration, oversight, and fiscal management for all HPRP programs. The City uses accounting practices that conform to state law, city administrative codes, and generally accepted accounting principles established by the Government Accounting Standards Board. The City accounting services, such as internal controls, finance systems, and auditing, ensures that HPRP-funded activities best support the goals of the HPRP.

Second, the City will monitor subgrantee activities, including financial reviews and performance evaluations, to determine that all HPRP activities comply with program regulations, including timely expenditures of funds.

The City's ongoing monitoring system includes:

Proposal Review – All HPRP proposals must have eligible program activities that meet the national objectives. Subgrantees must demonstrate the service capacity, financial stability, cultural competency, and organizational experience to serve the targeted populations. HPRP proposals must identify realistic and measurable outcomes. The City will also determine whether subgrantee's service models provide HPRP services that promote long-term household stability even after HPRP assistance has expired.

Contracts – All HPRP subgrantees contracts will identify all applicable federal, state, and city regulations and compliance requirements, including a detailed budget and a program timeline.

Administrative monitoring – The City project manager will provide ongoing technical assistance to subgrantees. Each HPRP program reimbursement will require expense documentation, progress report, and a review by the City project manager and accounting staff for accuracy before the reimbursements are processed. The City also participates on a multi-jurisdictional Stewardship Council, which provides technical assistance and on-site support to homeless service providers in need of stability assistance

On-site monitoring – The City will make site visits to some HPRP subgrantees. Selection of subgrantees is based on risk factors, including the funding amount, program complexity, and subgrantee's capacity to implement HPRP activities. The City will examine subgrantees' financial systems and controls, program cost

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

reasonableness, program eligibility, and other applicable requirements. Grantees will receive a written monitoring report after the visit.

Reporting - The City and subgrantees will submit any data and outcome report that HUD may require within the designated timeframe. Furthermore, the City will submit quarterly performance reports, as required, on the use of Recovery Act funds.

Evaluation - To create ongoing systemic change, the City will request that subgrantees also provide a narrative of the key challenges facing the program participants and whether the HPRP funded activities prevent people from becoming homeless or assist homeless residents to secure permanent housing. Subgrantees will use HMIS data, quarterly reports, and the program narratives to develop a non-judgmental, result-based, real time evaluation that describes the desired results in measurable terms and potential actions plans for continuous improvement of homeless prevention efforts. These subgrantee internal reviews become outcome-based evaluation tools that capture HMIS data and other nonquantifiable anecdotal causation to demonstrate what service delivery works best to empower homeless citizens towards self-sufficiency.

D. Collaboration

1. Briefly describe how the grantee plans to collaborate with the local agencies that can serve similar target populations, which received funds under the American Recovery and Reinvestment Act of 2009 from other Federal agencies, including the U.S. Departments of Education, Health and Human Services, Homeland Security, and Labor (limit 250 words).

Response: Recognizing the American Recovery and Reinvestment Act (ARRA) national objectives, the City's comprehensive approach will serve its homeless citizens and at risk of being homeless citizens as follows:

First, the City and Ramsey County are working to secure multiple funding sources across program areas to serve Saint Paul citizens in need. Specifically, the City and County are creating a comprehensive HPRP by leveraging \$3.2 million of HPRP funds with state-funded Family Homeless Prevention Assistance Program (estimated at \$2.6 million). Additionally, the City and County will actively pursue other federal funding opportunities, such as Homeless Veterans Reintegration grant.

Second, the City and County are working with Workforce Solutions for job training, employment, and job retention services for low-income citizens.

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Third, the City will develop more affordable housing by leveraging funding sources such as:

- The City's Neighborhood Stabilization Program (NSP) will stabilize low-income neighborhoods with the greatest need by rehabilitating foreclosed homes into affordable housing. Using NSP funds, Twin Cities Habitat for Humanity will also create affordable housing for households at 50% of area median income.
 - As a Low Income Housing Tax Credits (LIHTC) suballocator, the City works with the State of Minnesota to develop shovel-ready LIHTC housing developments – pending guidance from HUD and the Treasury regarding ARRA funding for housing tax credit developments. Moreover, any city-financed LIHTC development must serve households at 30% AMI and 50% AMI.
 - Energy Conservation and Weatherization Programs will assist low-income households by developing affordable energy-efficient housing.
2. Briefly describe how the grantee plans to collaborate with appropriate Continuum of Care and mainstream resources regarding HPRP activities (limit 250 words).

Response: First, the City has continual contact with Continuum of Care (C of C) providers and community agencies that serve homeless citizens and at-risk households. Through numerous touch points, the City and community agencies serve low-income citizens, homeless citizens, and at-risk households. These working relationships may be based upon contractual agreements (i.e. ESG or City contracts, etc.), City's membership on community advisory groups (i.e. Homeless Advisory Board, Supportive Housing Funders' Council, FHPAP Advisory Board) or City's partnerships with affordable housing financing. Consequently, it is the City's collaboration with its community partners that creates the foundation on which to develop a comprehensive HPRP.

Second, the City has a history of consulting with community agencies before drafting Consolidated Plans. In preparing the Substantial Amendment, the City consulted with community agencies, FHPAP Advisory Committee (service providers and citizens), foundation representatives, and government representatives to determine the needs of homeless citizens and service delivery priorities to be considered for HPRP funding. Simply speaking, the City recognizes that Saint Paul service providers are the "experts" in addressing the needs of our citizens.

Third, the City partners with the County C of C for a comprehensive HPRP by contractual agreements with C of C service providers and community agencies. More specifically, the City's collaboration with the C of C Coordinator, the County's Coordinator to End Homelessness, and C of C providers is the City's implementation plan to meet the national HPRP objective – empowering homeless citizens to achieve more stable housing

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

3. Briefly describe how HPRP grant funds for financial assistance and housing relocation/stabilization services will be used in a manner that is consistent with the grantee's Consolidated Plan (limit 250 words).

Response: In accordance with Consolidated Plan to help low-income households avoid homelessness, the City will allocate 40% of HPRP funds towards Rapid Rehousing and 60% for Homeless Prevention with following HPRP guidelines:

Rapid Rehousing

- Target households at 30% AMI
- General Parameters - \$4000/(1-2 bedroom need)
- General Parameters - \$8,000/(3+ bedroom need)
- Short-term assistance (up to three months)
- Longer term assistance (4-18 months) with shallow subsidy as follows:

\$200/month - 1 bedroom unit

\$300/month - 2 bedroom unit

\$400/month - 3 bedroom unit

Participants must contribute towards housing costs. Assistance after six months is offered on a declining basis. Financial assistance may include security deposits, rent, utility, and rent arrearages (up to six months if retaining housing).

Participating agencies must provide case management services to assist households in stabilizing housing; coordinating with employment training, and case management as needed. Agencies must collaborate with Saint Paul School's Homeless Coordinator, when appropriate.

Homeless Prevention Program

- Maximum assistance - \$2500/household.
- All participants will be screened:
 - Homelessness is imminent without assistance
 - Limited assistance will prevent homelessness
 - Households meet 50% AMI.

Participating households may accept case management for a three-month period. Financial assistance will be for housing costs to the extent that participant can secure or retain housing.

In addition to HPRP activities, City funding priorities include: assist low-income renters in foreclosed buildings; legal services to assist tenants retain housing; case management for homeless youth, and additional County Emergency Assistance staff so participants can better access EA benefits.

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

E. Estimated Budget Summary

HUD requires the grantee to complete the following table so that participants in the citizen participation process may see the grantee's preliminary estimated amounts for various HPRP activities. Enter the estimated budget amounts for each activity in the appropriate column and row. The grantee will be required to report actual amounts in subsequent reporting.

HPRP Estimated Budget Summary			
	Homelessness Prevention	Rapid Re- housing	Total Amount Budgeted
Financial Assistance ¹	\$1,080,479	\$720,318	\$1,800,797
Housing Relocation and Stabilization Services ²	\$720,319	\$480,212	\$1,200,531
Subtotal (add previous two rows)	\$1,800,797	\$1,200,531	\$3,001,328

Data Collection and Evaluation ³	\$131,927
Administration (up to 5% of allocation)	\$164,908
Total HPRP Amount Budgeted⁴	\$3,298,163

¹Financial assistance includes the following activities as detailed in the HPRP Notice: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel or hotel vouchers.

²Housing relocation and stabilization services include the following activities as detailed in the HPRP Notice: case management, outreach, housing search and placement, legal services, mediation, and credit repair.

³Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

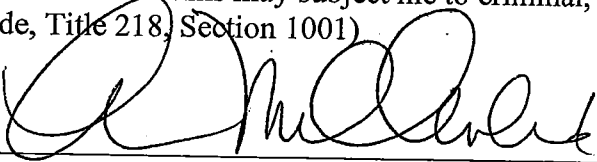
⁴This amount must match the amount entered in the cell on the table in Section A titled "Amount Grantee is Requesting."

Please note that these estimated HPRP amounts are based upon the assumption that State of Minnesota will fund the Family Homeless Prevention and Assistance Program at its current level for the next biennium

**Substantial Amendment to the Consolidated Plan 2008 Action Plan for the
Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

F. Authorized Signature

By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete, and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)



Signature/Authorized Official

5/15/09

Date

Deputy Mayor

Title

Homelessness Prevention and Rapid Re-Housing Program (HPRP) Certifications

The HPRP Grantee certifies that:

Consolidated Plan – It is following a current HUD-approved Consolidated Plan or CHAS.

Consistency with Plan – The housing activities to be undertaken with HPRP funds are consistent with the strategic plan.

Confidentiality – It will develop and implement procedures to ensure:

- (1) The confidentiality of records pertaining to any individual provided with assistance; and
- (2) That the address or location of any assisted housing will not be made public, except to the extent that this prohibition contradicts a preexisting privacy policy of the grantee.

Discharge Policy – A certification that the State or jurisdiction has established a policy for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.

HMIS – It will comply with HUD's standards for participation in a local Homeless Management Information System and the collection and reporting of client-level information.



Signature/Authorized Official

5/12/09

Date

Mayor - Deputy

Title

GENERAL CERTIFICATIONS FOR STATE OR LOCAL GOVERNMENT FOR THE HOMELESSNESS PREVENTION AND RAPID RE-HOUSING PROGRAM (HPRP)

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the state, territory, or local government certifies that:

Affirmatively Further Fair Housing -- The state, territory, or local government will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction or state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Drug-Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about:
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

- (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, state, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

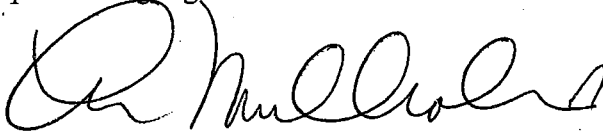
Anti-Lobbying -- To the best of the state, territory, or local government's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Local Government, State, or Territory -- The submission of the consolidated plan is authorized under state law and local law (as applicable) and the jurisdiction or state possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with Plan -- The housing activities to be undertaken with HPRP funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



Signature/Authorized Official

5/12/09

Date

Mayor - Deputy

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The Grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

City Hall, 15 W. Kellogg Blvd., Saint Paul, MN 55102, Ramsey County

City Hall Annex, 25 W. 4th St., Saint Paul, MN 55102, Ramsey County

Check ☐ if there are workplaces on file that are not identified here.

The certification with regard to the drug-free workplace is required by 24 CFR part 24, subpart F.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).